

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

**IN RE: DIGITEK PRODUCT LIABILITY
LITIGATION**

MDL NO. 1968

THIS DOCUMENT RELATES TO ALL CASES

NOTICE OF VIDEO DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30 and Pretrial Orders No. 16 and 22, Defendants will take the deposition of David M. Bliesner, Ph.D. on July 13, 2010, at 8:30 a.m. at the offices of Parker Poe, Wachovia Capitol Center, 150 Fayetteville Street, Suite 1400, Raleigh, North Carolina 27601. This deposition is noticed in the above-captioned matter for any and all purposes permitted by the Federal Rules of Civil Procedure, and any other federal, state, or local rules that apply to this action, and the deposition will be taken in accordance with these rules and Court Orders. The oral examination will continue from day to day until completed. This deposition will be recorded stenographically and on videotape and will comply with any relevant orders in this MDL, including Pretrial Order No. 22, attached. Pursuant to F.R.C.P. 30(b)(2) and F.R.C.P. 34, Defendants request that Dr. Bliesner produce for inspection:

1. His complete office file regarding the Digitek litigation, including billing information, draft reports, hard copies of e-mails and other correspondence;
2. Any and all medical literature or reference files Dr. Bliesner maintains pertaining to digoxin; and
3. Dr. Bliesner's curriculum vitae.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2010, I served via email and regular United States Mail a true and correct copy of the foregoing **Notice of Deposition** to:

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